

PGS 1-6

+  
EXHIBITS - 1-30

Robert McGuffey ID NO. 1040469

~~SOUTHERN DESERT CORRECTIONAL CTN.~~ Lovelock, Correctional, Center  
~~20825 GOLD CREEK RD.~~ 1200 PRISON RD  
~~P.O. BOX 208~~  
~~INDIAN SPRINGS, NV 89010~~ Lovelock, NV, 89419

United States District Court  
District of Nevada

Robert, ADAM, McGuffey  
 v. TRAVIS BENNETTE ETAL  
STATE OF NEVADA AND  
Department of Corrections

CASE NO.: 3:16-cv-00356

DEPT. NO.: \_\_\_\_\_

DOCKET: \_\_\_\_\_

Motion For A Immediate ORDER to STOP the ATTACK ON MY  
CRIMINAL POST CONVICTION ATTORNEY MARY LOU WILSON ESQ, THIS  
ATTACK IS PROOF OF RETALIATION AND CONTINUED TORTURE OF ME.  
AND ALLOW ALL INFORMATION IN THIS MOTION AS EVIDENCE, AND SUPPORTING DOCUMENTS

COMES NOW, ROBERT, ADAM McGuffey, herein above respectfully  
 moves this Honorable Court for an Immediate INJUNCTIVE ORDER STOPPING  
THE CONTINUED RETALIATION, AND TORTURE OF ROBERT MCGUFFEY  
By Issuing A ORDER STOPPING THE ATTACK ON MARY LOU WILSON ESQ

This Motion is made and based upon the accompanying Memorandum of Points and  
 Authorities, AND A WRIT OF MANDAMUS, AND PROHIBITION, Filed By MARY LOU WILSON  
AND RELIEF SOUGHT By Robert McGuffey Please see Exhibit 1 and 2 1-30 PGS  
 DATED: this TH day of September, 2016

BY: Robert G. McGuffey  
Robert, ADAM McGuffey = 1040469  
 Defendant In Proper Personam

<input checked="" type="checkbox"/> FILED	<input type="checkbox"/> RECEIVED
<input type="checkbox"/> ENTERED	<input type="checkbox"/> SERVED ON
COUNSEL/PARTIES OF RECORD	
NO COPY SEP 15 2015	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

Memorandum of Points and Authorities  
AND Writ of Mandamus and Prohibition. IN Support  
OF SAID Motion. PRAYER FOR RELIEF

1 My Attorney MARY Lou Wilson Esq is UNDER ATTACK  
2 BY THE STATE OF NEVADA AND ITS OFFICERS AND  
3 EMPLOYEES THIS IS NOT ONLY A ATTACK ON HER, BUT  
4 A ATTACK ON THE CONSTITUTIONAL RIGHTS OF EVERY  
5 AMERICAN. MARY Lou Wilson is A PRIVATE LAWYER IN  
6 GOOD standing WITH THE NEVADA STATE BAR AND HAS  
7 BEEN PRACTICING LAW SINCE 1987, "PLEASE SEE ATTACHED  
8 AFFIDAVIT OF MARY Lou Wilson" HER PRACTICE ONLY ACCEPTS  
9 INDIGENT POST CONVICTION CLIENTS. MARY Lou Wilson's  
10 SUCCESS RATE OF FAVORABLE OUTCOMES AND RULINGS  
11 ON BEHALF OF HER CLIENTS, AND HER REFUSEL TO  
12 CATER, ACCOMMODATE AND DISPOSE OF CASES ASSIGNED  
13 TO HER BY <sup>THE</sup> STATE OF NEVADA, IN A FAVORABLE MANNER  
14 TO THE STATE OF NEVADA, AND ITS OFFICERS, AND EMPLOYEES.  
15 BECAUSE OF HER REFUSAL TO THROW HER CLIENTS  
16 UNDER THE BUS, SHE HAS INFURRIORATED THE AFORE  
17 MENTIONED PARTIES. "PLEASE SEE PETITION FOR WRIT OF  
18 MANDAMUS, OR ALTERNATIVELY A WRIT OF PROHIBITION"  
19 MY CASE SPECIFICALLY CR12-0465, AND ITS TRAFKABLE  
20 EVIDENCE THAT SUPPORTS INEFFECTIVE ASSISTANCE OF  
21 COUNSEL, AND A PLEA THAT WAS PROCURED BY TORTURE  
22 BY EXCESSIVE AMOUNTS OF SOLITARY CONFINEMENT OF  
23 A MENTALLY ILL MAN WHO SUFFERS FROM P.T.S.D., AND  
24 WHO'S ONLY CRIME IS UNCONTROLLABLE VERBLE OUTBURSTS  
25 DUE TO BEING SICK, WHO WAS DENIED A CONSTITUTIONAL  
26 BAIL AMOUNT, "100,000 CASH ONLY." AND AS A PRE-TRIAL  
27 detainee <sup>WAS</sup> REFUSED A PRR AIGNMENT, AND PRELIMINARY

1 HEARING FOR 8mos. I've been with MARY LOU WILSON  
 2 FOR almost 2 yrs. she was appointed Jan. 22, 2015.  
 3 WITHOUT HER REPRESENTATION, HER ASSISTANTS, AND HER  
 4 INVESTIGATOR, AND THE EXPERT WITNESS. AND MY 6TH  
 5 AMENDMENT RIGHT TO ENJOY A MEANINGFUL RELATIONSHIP  
 6 WITH COUNSEL WHICH HAVE taken years to develop  
 7 PROVEN BY the date of INITIAL APPOINTMENT IS IN  
 8 JEOPARDY! AND IS CLEAR EVIDENCE OF RETALIATION  
 9 AND CONSPIRACY TO INTENTIONALLY: HAMPER, STOP, DETER,  
 10 A FAVORABLE RULING OR OUTCOME WHICH WOULD IMMEDIATELY  
 11 RELIEVE ME OF THE CONTINUED THREATS INTIMIDATION  
 12 AND TORTURE, OF CONTINUED FALSE IMPRISONMENT AND  
 13 SOLITARY CONFINEMENT. IT'S MY BELIEF THAT BECAUSE  
 14 OF MY SUIT AGAINST N.D.O.C., AND THE STATE OF NEVADA,  
 15 AND MARY LOU'S SUCCESS ON BEHALF OF HER CLIENTS,  
 16 THE WASHOE COUNTY DISTRICT ATTORNEY'S OFFICE, AND  
 17 THE ALTERNATE PUBLIC DEFENDERS OFFICE AND N.D.O.C.  
 18 ITS OFFICERS AND EMPLOYEES ARE TRYING TO STOP AND  
 19 PREVENT ANY FAVORABLE OUTCOME OR RULING IN MY  
 20 FAVOR BY VIOLATING MY 6TH AMENDMENT CONSTITUTIONAL  
 21 RIGHTS, BY DEMANDING THAT MARY LOU WILSON STOP  
 22 WORKING IMMEDIATELY ON MY CASE. I'M REQUESTING  
 23 IMMEDIATE FEDERAL HELP. MARY LOU'S REMOVAL FROM  
 24 MY CASE WOULD IN FACT CHANGE THE OUTCOME OF MY  
 25 SEPT 23RD 2016 EVIDENTIARY HEARING AND WOULD CAUSE  
 26 IRREPARABLE HARM TO ME, AND CAUSE MY CONTINUED  
 27 TORTURE BY THE NEVADA DEPARTMENT OF CORRECTIONS.

## ADDITIONAL FACTS OF THE CASE:

## INJUNCTIVE RELIEF

1 Relief Sought: A STOP ON, OR, OF THE ATTACK ON MARY LOU WILSON  
 2 A ORDER FOR THE Continued Representation of Mary Lou  
 3 Wilson Esq., To Be Removed From the Custody of  
 4 the State of NEVADA, AND PLACED IN Federal Custody  
 5 IN ORDER to Alleviate the Continued RETALIATION,  
 6 THREATS, Intimidation of a Mentally Ill PRISONER, AND  
 7 the Continued Violation of Civil and Constitutional  
 8 Rights, AND to Be Free From CRUEL AND UNUSUAL  
 9 Punishment. I Robert, ADAM, McGuffey A Former  
 10 Federal Officer with the U.S. Department of  
 11 Homeland Security PRAY THAT THIS HONORABLE COURT  
 12 GRANT my Injunctive Relief AND put A STOP to the  
 13 Continued CRIMES, AND Injustices By the State of  
 14 NEVADA its officers AND Employees.

21 <sup>RM</sup>  
 22 DATED this 18TH day of September, 2016

23 Robert Adam McGuffey  
 24 1040469

25 ROBERT, ADAM, MCGUFFEY  
 26 Acting in PRO-SE.

## PUNATIVE DAMAGES Sought

IN CASE 3:16-CV-00356 TO COINCIDE  
WITH INJUNCTIVE RELIEF

\$ 1000<sup>00</sup> DOLLARS A DAY FOR EVERY DAY OF Mental  
Torture and Anguish By Continued Threats Intim-  
idation, By Excessive Amounts of Solitary Con-  
finement, Retaliatory Notice of Charges, And the  
Platant Refusal of Acknowledgement of my Severe  
Mental Health Conditions, And Continued Forced  
Interactions with the Very People I'm IN FEAR  
OF, AND WHO Continue to Abuse Inmates. ALSO FOR  
False Imprisonment. THE Mental torture of SOLI-  
TARY Confinement Has Been Proven By PENN  
PSYCHIATRIST, AND PSYCHOLOGIST to HAVE devastating  
Mental Health Affects, AND HAS INFECT BEEN deemed  
AS torture. "Please See Senator GRIFINS Hearing Report"  
Sub Committee 3 ON THE JUDICIARY CRIME AND CORRECTIONS  
AND EFFECT OF Segregated Confinement OF PRISONERS. ALSO  
Senator JOHN MCGAIN'S testimony to Congress ABOUT THE  
torture of Solitary Confinement AS A PRISONER.  
A 1000<sup>00</sup> DOLLARS A DAY FOR EVERY DAY I'm Forced  
Since FEB 10TH, 2016 UNTIL THE PRESENT, AND INTO  
THE FUTURE AS LONG AS THE TORTURE PERSISTS.

Dated this 8TH day of September, 2016

Robert A. McGuffey

1040469

ROBERT, ADAM, MCGUFFEY

Acting IN PRO-SE.

AFFIDAVIT OF: ROBERT ADAM MCGUFFEY

STATE OF NEVADA )

SS:

COUNTY OF ~~CLARK~~  
WASHOE )

TO WHOM IT MAY CONCERN:

I, ROBERT ADAM MCGUFFEY, the undersigned, do hereby swear that all statements, facts and events within my foregoing Affidavit are true and correct of my own knowledge, information and belief, and as to those, I believe them to be True and Correct. Signed under the penalty of perjury, pursuant to, NRS. 29.010; 53.045; 208.165, and state the following:

MARY LOU WILSON IS MY ATTORNEY OF RECORD ON CASE CR-120465 THE EVIDENTIARY HEARING IS ON SEPTEMBER 22nd, 2016 SHE IS UNDER ATTACK BY THE STATE OF NEVADA'S OFFICERS AND EMPLOYEES, AND N.D.O.C., AND SO AM I. I CONTINUE TO BE INTIMIDATED, THREATENED AND TORTURED BY EXCESSIVE SOLITARY CONFINEMENT, AND CONTINUED N.O.C.'S I HAVE P.T.S.D AND IM BIPOLAR, AND HAVE ATTACHMENT DISORDER I AM INDIGENT, AND I AM NOT SCHOoled IN LAW IM IN SOLITARY CONFINEMENT AND IN FEAR FOR MY LIFE AND CONTINUED RETALIATION AND CONSPIRACY BY THE STATE OF NEVADA N.D.O.C. ITS OFFICERS AND EMPLOYEES. IF THE STATE OF NEVADA AND N.D.O.C. ITS OFFICERS AND EMPLOYEES ARE SUCCESSFUL IN THERE ATTACK ON MARY LOU WILSON, THE RESULT WILL HAVE DIR CONSEQUENCES ON MY POST CONVICTION APPEAL.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

EXECUTED At: LOVELOCK, NEVADA, this 8TH Day Of September, 2016.

BY: ROBERT ADAM MCGUFFEY #1040469  
ROBERT MCGUFFEY  
Post Office Box 203 (SDCC)  
Indian Springs Nevada 89070.  
Affiant, In Propria Personam:  
1200 PRISON RD  
LOVELOCK, NV. 89419

## EXHIBITS List

EXHIBIT 1.) Petition For WRIT OF Mandamus  
PG-1-28 OR ALTERNATIVELY, A WRIT OF PROHIBITION

EXHIBIT 2.) AFFIDAVIT OF MARY LOU WILSON  
PG 10F1 AFFIRMING RETALIATION BY THE STATE OF NEVADA  
AND EFFECTIVELY PUTTING HER OUT OF BUSINESS  
AND CAUSING SUBSTANTIAL HARM TO HER CLIENTS

EXHIBIT List

## EXHIBIT 1

Petition For writ of Mandamus, OR  
ALTERNATIVELY, A writ of Prohibition

PGS 1-28

EXHIBIT 1

IN THE SUPREME COURT OF THE STATE OF NEVADA

THE LAW OFFICE OF MARY LOU WILSON, INC.;  
CODIE MICHAEL SCOTT WALKER; CR12-0319A  
ROBERT ADAM MCGUFFEY; CR12-0465  
MIGUEL OMAR OJEDA-ENRIQUEZ; CR11-0482 and No. 69063  
IGNACIO VALENCIA; CR10-2173  
AURORA RODRIGUEZ-PEREZ; CR11P1020B and No. 70745  
MOHAMED KAMALAUDEEN; CR08-0196 and No. 69247  
D'VAUGHN KING; CR12-1160  
DAVID SANCHEZ-DOMINGUEZ; CR10-0866 and No. 70622  
JOSE FRANCISCO; CR12-2051  
LUIS EDUARDO MARTINEZ; CR13-1937 and No. 69641  
DONALD JACKSON; CR12-1617  
ANTHONY EUGENE THOMAS; CR09-0207  
AIRELL SAWYER; CR06P1022 and #67829  
ROBERT SCHNUERINGER, CR12-0326A

Electronically Filed  
Aug 26 2016 04:32 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

Petitioners,

ADKT No. 411

vs.

THE SECOND JUDICIAL DISTRICT COURT-  
INDIGENT DEFENSE REPORT IMPLIMENTING  
IN THE MATTER OF THE REVIEW OF ISSUES CONCERNING  
REPRESENTATION OF INDIGENT DEFENDANTS  
IN CRIMINAL AND JUVENILE DELINQUENCY CASES;  
(ADKT No. 411) and  
THE MODEL COURT SELECTION COMMITTEE,

Respondents.

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PETITION FOR WRIT OF MANDAMUS, OR ALTERNATIVELY,  
A WRIT OF PROHIBITION

1 This is a Petition for Writ of Mandamus, or alternatively, a writ of prohibition.  
2 This Court may elect to exercise its discretion and consider the merits of this writ  
3 petition in the interest of sound judicial economy and administration. *Cote H. v.*  
4 *Eighth Judicial Dist. Court*, 124 Nev. 36, 39, 175 P.3d 906, 908, (2008) (noting  
5 that this Court has complete discretion to determine whether to consider a petition  
6 for a writ of mandamus or prohibition and that even when an arguably adequate  
7 remedy exists, this Court may exercise its discretion “under circumstances of  
8 urgency or strong necessity, or when an important issue of law needs clarification  
9 and sound judicial economy and administration favor the granting of the petition”  
10 (initial quotation marks omitted)).”  
11  
12

13  
14 A writ of mandamus is available to compel the performance of an act that the  
15 law requires as a duty resulting from an office, trust, or station or to control an  
16 arbitrary or capricious exercise of discretion.” *Int’l Game Tech., Inc. v. Second*  
17 *Judicial Dist. Court*, 124 Nev. 193, 197, 179 P.3d 556, 558 (2008); NRS 34.160.  
18

### 19 History

20 On August 22, 2016 post conviction counsel, Wilson, (Wilson) received a letter  
21 from Jennifer Lunt, Alternate Public Defender, as representative of the Model  
22 Court Selection Committee. Ex. 1. Wilson immediately contacted Court  
23 Administrator, Robert C. Bell, with a list of open and pending cases, which  
24 included seven (7) scheduled evidentiary hearings. Ex. 2 and 3.  
25

1 Within the letter from the Model Court Selection Committee, it specifically  
2 advised that all open and pending cases were to be taken from Wilson and  
3 reassigned to different lawyers. Ex. 1.

4  
5 Prayer for Relief

6 Wilson, requests this Court prohibit the Model Court Selection Committee from  
7 enforcing its decision to preclude Wilson from receiving any new cases from the  
8 Court Administrator and take away all open and pending cases; remove the  
9 Alternate Public Defender and Washoe County Public Defender from the  
10 Committee; preclude members of the Washoe County District Attorney's Office  
11 from interfering with the Committee's decision-making; and mandate the  
12 Committee to reinstate Wilson to retain the ten (10) open and pending cases. Ex. 4,  
13 ADKT 411 Ex. 5, A, pp. 18-22.

14  
15  
16 Jurisdiction

17 Wilson has no plain, speedy, and adequate remedy in law from the Model Court  
18 Selection Committee's decision. NRS 34.170.

19 Within the Second Judicial District Court-Indigent Defense Report  
20 implementing the Matter of the Review of Issues Concerning Representation of  
21 Indigent Defendants in Criminal and Juvenile Delinquency Cases for ADKT No.  
22 411, Appointment of Private Attorneys, does not provide any appellate remedy  
23 from its Model Court Selection Committee's decision. Ex. 5.  
24  
25

1 **Arguments**

- 2 I. **The Model Court Selection Committee relied upon subjective criteria to**  
3 **remove Wilson from her open and pending cases, making their decision**  
4 **arbitrary and capricious**  
5

6 The criteria that the Model Court Selection Committee should apply, according  
7 to the Second Judicial District Court – Indigent Defense Report, provides: On an  
8 ongoing basis, the Appointed Counsel Selection Committee shall:  
9

- 10 1. Review the lists created and modify membership as the Committee deems  
11 appropriate;  
12

13 There are no objective standards that a reasonable post conviction attorney  
14 could apply to the indigent defense practice.

- 15 a. Annually review the performance and qualifications of attorneys on the  
16 Appointed Counsel lists;  
17

18 Wilson had her Independent Contractor Agreement For Indigent Defense  
19 Services renewed from 2008 to June 30, 2017.

- 20 b. Annually solicit input from Judges, and others familiar with the practice of  
21 criminal defense, juvenile and family law where appointed counsel are  
22 utilized;  
23

24 Wilson has learned that the complaining party regarding her performance with  
25 the complaints to the Model Selection Committee have come from opposing

1 counsel in contested cases, Chief Appellate Deputy District Attorney, Terrence P.  
2 McCarthy, showing bias. Ex. 6.

3  
4 c. Review any complaints from clients;

5 The Model Selection Committee has not received any complaints from her  
6 clients. Ex. 1. In fact, the Petitioner in one of the two Nevada Supreme Court cases  
7 that Chief Appellate Deputy District Attorney Terrence P. McCarthy complained  
8 about, Craig Hoffman, sent a letter to Wilson after she was removed and indicated  
9 that he was disappointed that Wilson was no longer going to be his counsel of  
10 record. Ex. 19.

11  
12 d. Review the history of participation in training of each new applicant and  
13 each contract, hourly and capital case list attorney receiving appointment;

14  
15 The Model Selection Committee has not complained about Wilson's  
16 participation in training.

17  
18 e. Determine eligibility and selection of appointed counsel for new or  
19 continued participation.

20 After the one meeting with The Model Selection Committee on November 9,  
21 2015, regarding the two (2) Nevada Supreme Court decisions, Coleman and  
22 Hoffman, Jennifer Lunt advised Wilson that there would be no new cases given to  
23 her until the Committee had reached a decision. Ex. 6.

24  
25 //

1 Wilson did not hear back from the Committee until August 22, 2016, ten (10)  
2 months later, which terminated open and pending cases. Ex. 1

3  
4 Ex. 5, Section V, A, 5

5 The Model Selection Committee has chosen two (2) Nevada Supreme Court  
6 Orders to utilize as grounds for termination of Wilson's, services.

7 Within the August 18, 2016 letter, the following reason was provided,

8 "The first involved two sanctions imposed by the Nevada Supreme Court." Ex.  
9 1, 7, (Coleman) and Ex. 8, (Hoffman).

10 Within the Nevada Supreme Court decision in Ronnie Money Coleman, No.  
11 67909, filed October 20, 2015, this Court reversed and remanded the matter to the  
12 district court for further proceedings consistent with the order. Ex. 7.

13 There were no sanctions imposed by this Court.

14 Within the Nevada Supreme Court decision in Craig Allen Hoffman v. The  
15 Second Judicial District Court of the State of Nevada, in and for the County of  
16 Washoe; the Honorable Jerome Polaha, District Judge; and the State of Nevada,  
17 No. 68441, this Court Ordered the petition Granted, in part, and Directed the Clerk  
18 of the Court to Issue A Writ Of Mandamus instructing the district court to rescind  
19 its prior Order closing the post conviction proceedings, remove Ms. Wilson as  
20 counsel in the post conviction proceedings, and appoint new counsel to assist  
21 Hoffman in the proceedings.  
22  
23  
24  
25

1 Within footnote two (2) this Court stated, “Ms. Wilson is cautioned that such  
2 future dereliction may result in other sanctions considered necessary by the district  
3 court, including referral to the State Bar of Nevada. Ex. 8.  
4

5 As indicated to the Model Selection Committee on November 9, 2015, Wilson  
6 suggested to this Court that she be removed from Hoffman’s post conviction case  
7 in lieu of closing the Hoffman proceedings. Ex. 9, p. 8.  
8

9 Additionally, it appeared that this Court’s footnote was cautionary in nature and  
10 did not result in referral to the State Bar of Nevada. Ex. 6.

11 Within the August 18, 2016 letter it reads, “This is the second time the Model  
12 Court Selection Committee has been notified of issues with your level of  
13 performance in the Second Judicial District Court. The second incident involves  
14 serious allegations of lack of candor to the court, and deficient pleadings.” Ex. 1.  
15

16 This letter does not contain anything that could be considered a serious  
17 allegation of lack of condor to the court and deficient pleadings. Ex. 1.  
18

19 After Wilson’s meeting with the Model Court Selection Committee on  
20 November 9, 2015, where all future cases were suspended until the Committee  
21 contacted Wilson, she received a letter from Jeremy Bosler dated June 1, 2016,  
22 eight (8) months later.  
23

24 This letter from the Model Court Selection Committee was received by Wilson  
25 almost one month later on June 27, 2016. The letter requested Wilson answer

1 questions posed regarding the post conviction case of Mary Anne Mattoon v.  
2 Warden. F.M.W.C.C and the State of Nevada, CR10-1294. Ex. 10.

3  
4 It was unclear who launched this complaint to the Model Court Selection  
5 Committee. However, consistent with the prior complaint, Chief Appellate Deputy  
6 District Attorney, Terrence P. McCarthy, opposed Ms. Mattoon's motion to  
7 withdraw her petition in a telephone conference between parties. Ex. 6.

8  
9 Wilson responded to Mr. Bosler through emails that the questions posed in the  
10 letter would be answered immediately. Ex. 11.

11 Mr. Bosler was also advised that Wilson requested, received, and sent a copy of  
12 the transcript from the court proceedings to assist the Model Court Selection  
13 Committee. Ex. 12 (emails) and Ex. 13 (transcript of proceedings).

14  
15 Within the transcript of the Mattoon hearing, the Honorable Judge Elliott Sattler  
16 made the following comments with regard to Wilson's experience and diligence in  
17 the Mattoon case. Judge Sattler stated, "... I appreciate all the work that you've  
18 put in on Ms. Mattoon's part. Certainly you have not been derelict in your duties in  
19 attempting to represent Ms. Mattoon to the best of your ability." Ex. 13, p.6, L. 22-  
20 24 and p. 7, L. 1. The district court went on to state, "... The Court has appointed  
21 you counsel. Counsel has been very experienced - - or is very experienced. She has  
22 been working diligently on your behalf." Ex. 13, p. 7, L. 21-24. The Court also  
23 noted, "... The person you probably should appreciate, frankly, the most is Ms.  
24  
25

1 Wilson. As I can see from the document that she filed yesterday, she has been  
2 working very diligently on your case as she does with all of her clients.

3 She's put in a lot of work on it." Ex. 13, p. 12, L. 24 and p. 13, L. 1-5.

4  
5 Wilson, answered Mr. Bosler's letter within six (6) days, of the Model Court  
6 Selection Committee's questions regarding the Mattoon case on July 2, 2016,  
7 provided a ten (10) page response letter with sixty (60) exhibits. Ex. 14 and 18.

8  
9 Wilson, received no response from Mr. Bosler or the Model Court Selection  
10 Committee regarding these questions about the Mattoon case and no hearing was  
11 held. Ex. 6.

12  
13 As such, the actions of the Model Selection Committee terminating services of  
14 Wilson were based upon purely subjective criteria and inconsistent with the  
15 unsolicited opinions of the Honorable Judge Elliott Sattler within the transcript of  
16 proceedings on the very case that Mr. Bosler's letter was directed. Ex. 5, Section  
17 V, A, 5 and Ex. 13.

18  
19 II. The Second Judicial District Court – Indigent Defense Report Implementing  
20 the Matter of the Review of Issues Concerning Representation of  
21 Indigent Defendants in Criminal and Juvenile Delinquency Cases (ADKT  
22 No. 411); and The Model Court Selection Committee does not provide  
23 for an appeal or any other remedy from the decision of the Model Court  
24 Selection Committee withdrawing counsel from open and pending cases  
25

1 in violation of Wilson's Due Process Rights and the ten (10) post  
2 conviction open and pending cases

3  
4 A review of the above-entitled document provides no appellate review from the  
5 Model Court Selection Committee's decision of August 18, 2016, which stated,  
6 "You will no longer be appointed cases under the Appointed Case Counsel  
7 Administrator. Please take immediate steps to return all of your open and pending  
8 cases to the Office of Bob Bell, for re-assignment of counsel." Ex. 1.

9  
10 In contrast, the Second Judicial District Court – Indigent Defense Report  
11 Implementing the Matter of the Review of Issues Concerning Representation of  
12 Indigent Defendants in Criminal and Juvenile Delinquency Cases (ADKT No. 411)  
13 does provide for an appeal regarding fee disputes. Ex. 5, V. B. 1. b. (4) provides:  
14 "The payment of fees and expenses of contracted appointed counsel by Washoe  
15 County shall be governed by contract between counsel and Washoe County subject  
16 to appeal as described in III. E. 3. b., c., and d.

17  
18 The above-entitled sections provide: b. The extent and cost of these services  
19 shall be approved by the Appointed Counsel Administrator; c. The determination  
20 of the extent and approval of the amounts made by the Appointed Counsel  
21 Administrator may be appealed to the Washoe County Manager or their designee;  
22  
23 d. Appeals from the determination of the County Manager or their designee, as to  
24  
25

1 the extent and amount allowable for these fees, may be made to the Chief Judge of  
2 the Second Judicial District Court.

3  
4 As such, there was no such appellate procedure in place for the action taken by  
5 Ms. Lunt on behalf of the Model Court Selection Committee dated August 18,  
6 2016, advising Wilson that she would no longer be appointed cases under the  
7 Appointed Case Counsel Administrator and to immediately take steps to return all  
8 open and pending cases to the Office of Bob Bell, for reassignment of counsel. Ex.  
9  
10 1.

11 One meeting was held on November 9, 2015, from an email sent to post  
12 conviction counsel, Wilson, concerning the two (2) Nevada Supreme Court  
13 decisions, which Chief Appellate Deputy District Attorney Terrence P. McCarthy  
14 complained about to the Model Court Selection Committee.

15  
16 An email was sent to Wilson on November 4, 2015 from Ms. Lunt requesting  
17 Wilson's presence at the Alternate Public Defender's Office on November 9, 2015  
18 with the Selection Committee to discuss two (2) Nevada Supreme Court's  
19 decisions, Coleman and Hoffman. The Committee wanted to hear her side. Ex. 15.

20  
21 Wilson immediately prepared a history of the two cases and placed their  
22 contents within two binders for the Model Court Selection Committee's review.  
23  
24 Ex. 16 (Coleman) and Ex. 17 (Hoffman).

25 //

1 Upon arrival at the meeting, Wilson brought legal counsel, Michael E. Wilson,  
2 Esq. and two independent contractor paralegals to provide any assistance to the  
3 five (5) members of the Model Court Selection Committee.  
4

5 The November 9, 2015 meeting was held without a court reporter. Ms. Lunt  
6 advised Wilson, "We received this complaint from Chief Deputy District Attorney  
7 Terrence P. McCarthy regarding these two Nevada Supreme Court decisions." Ex.  
8 6.  
9

10 One of the members stated, "You must have really 'pissed off' somebody over  
11 in the District Attorney's Office." At least three (3) of the five members  
12 acknowledged this expression stating, "You better cross all your T's and dot all  
13 your I's." Ex. 6.  
14

15 Contrary to the casual nature of the email request to appear, the meeting was  
16 very adversarial and when Wilson's husband, Michael E. Wilson, attempted to  
17 explain some unfair treatment practices over the years, he was told to "shut up, we  
18 don't want to hear from you," by Member Lumkes. Ex. 15. (affidavit of Mike)  
19

20 When Wilson requested whether her two assistants could also attend the  
21 meeting, she was told "No." Ex. 6.  
22

23 Approximately one (1) hour later after Wilson attempted to explain the history  
24 of both Supreme Court decisions, the two (2) binders were provided to the Model  
25 Court Selection Committee to review at their leisure. Ex. 6.

1 Upon leaving the conference room, Ms. Lunt advised Wilson, "No further cases  
2 would be given to [her] until a decision was made and they would contact [her]  
3 with a decision." Ex. 6.

4  
5 During the following ten (10) months, Wilson received one (1) case, D'Vaughn  
6 King. Ex. 6.

7 The Second Judicial District Court – Indigent Defense Report Implementing the  
8 Matter of the Review of Issues Concerning Representation of Indigent Defendants  
9 in Criminal and Juvenile Delinquency Cases (ADKT No. 411) does not provide for  
10 any formal hearing or any other due process to protect post conviction counsel  
11 from arbitrary and capricious actions, which should include a meaningful due  
12 process hearing. Since these decisions of the Model Court Selection Committee  
13 can result in putting counsel completely out of business and adversely affect the  
14 Constitutional rights of clients, basic due process rights should apply.  
15

16 These should include a court reporter so that any action taken can be reviewed.  
17  
18 Additionally, the Appointed Counsel should have the right to counsel, cross-  
19 examine witnesses against them, and call witnesses in their favor.  
20

21 Another interesting factor that occurred after the November 9, 2015 meeting,  
22 the Court Administrator, Robert C. Bell, sent an email regarding self-reporting  
23 pursuant to ADKT 411. Ex. 21.  
24

25 //

1 Much like the Parole Board did in *Steve Dell McNeill v. The State of Nevada*,  
2 123 Nev., Advance Opinion 54, No. 66697, filed July 28, 2016, the Parole Board  
3 gave themselves power that were never granted.  
4

5 According to the Second Judicial District Court – Indigent Defense Report, the  
6 contract must be subject to termination annually or sooner, if determined by The  
7 Appointed Counsel Selection Committee that a contract attorney is not abiding by  
8 the standard guidelines for qualification of appointed counsel. Ex. 5, V. B. 1. (3).  
9

10 There are no provisions for sanctions being imposed during an investigation,  
11 like blocking the assignment of any new cases for ten (10) months, which was  
12 done to Wilson on November 9, 2015.  
13

14 There are no standards listed or implied that would allow the Model Court  
15 Selection Committee to impose sanctions or terminate the contract. Ex. 5.

16 The Model Court Selection Committee in an act of hindsight, required the Court  
17 Administrator, Robert C. Bell, send Appointed Counsel a new set of rules called  
18 “Self-Reporting,” which was neither officially adopted into the ADTK 411 nor  
19 adopted by the Second Judicial District Court Order implementing ADKT 411. Ex.  
20 4 and 5.  
21

22 Much like the Parole Board in McNeill, the Model Court Selection Committee  
23 never sought leave from this Court or the Second Judicial District Court to amend  
24 ADKT 411 or its implementation Order. Ex. 21.  
25

1 It is important to note that this new "Self-Reporting" rule was sent to the  
2 contract attorneys on February 26, 2016, three (3) months after the November 9,  
3 2016 meeting against Wilson.  
4

5 As such, the Model Court Selection Committee has acted as self-appointed  
6 investigator, judge, jury, and executioner against Wilson.  
7

8 The final decision made pursuant to the letter dated August 18, 2016 by the  
9 Model Court Selection Committee was held secretly, with no way of knowing  
10 whether all five members attended, whether only a quorum of the members were  
11 present, whether the vote was unanimous, by a majority of the whole or a majority  
12 of a quorum, whether the standard of proof was beyond a reasonable doubt, a  
13 preponderance of the evidence, or slight or marginal. Ex. 1.  
14

15 As such, the Model Court Selection Committee acted outside of basic due  
16 process rights, which will result in Wilson's going out of business. Ex. 6.  
17

18 More importantly, the letter of August 18, 2016, from the Model Court  
19 Selection Committee, violates the spirit and purpose of ADKT No. 411 when  
20 demanding Wilson's open and pending clients are reassigned a new lawyer. Ex. 1  
21 and Ex. 5.  
22

23 //

24 //

1 III. The Model Court Selection Committee was not qualified to evaluate

2 Wilson's performance since no member is a post conviction lawyer

3  
4 The Model Court Selection Committee must be appointed by the Court  
5 Administrator, Robert C. Bell and have the following qualifications for the five (5)  
6 attorneys:

7 (1) have no pecuniary interest in the outcome of the attorney selection or  
8 performance evaluation process;  
9

10 Two of the five Model Court Selection Committee members, Jennifer Lunt,  
11 Alternate Public Defender, and Jeremy Bosler, Washoe County Public Defender,  
12 head offices where Wilson alleged ineffective assistance of counsel against their  
13 deputies.  
14

15 Interestingly, the only two correspondences Wilson received were from these  
16 two people. Ex. 1 and 10.

17 Arguably, the continued employment with Washoe County of these two  
18 individuals, Ms. Lunt and Mr. Bosler, is directly related to the competency of the  
19 attorneys they have hired to work under their direction and control.  
20

21 //

22 //

23 //

24 //

25 //

1 As such, these two committee members have a pecuniary interest in removing  
2 Wilson from the Appointed Counsel list and should not be on the Model Court  
3 Selection Committee.<sup>1</sup>

4  
5 Regarding the open and pending cases Wilson has, the following trial counsel's  
6 have been alleged to be ineffective:

7 Robert Adam McGuffey, CR12-0465, had John Malone from the  
8 Alternate Public Defender's Office;

9  
10 Miguel Omar Ojeda-Enriquez, CR11-0482, had Joseph Merkin from the  
11 Washoe County Public Defender's Office;

12 Ignacio Valencia, CR10-2173, had Alternate Public Defender, Jennifer  
13 Lunt and Patrick McGinnis;

14  
15 Mohamed Kamalaudeen, CR08-0196, had Maizie Pusich and Jay Slocum  
16 from the Washoe County Public Defender's Office;

17 David Sanchez-Dominguez, CR10-0866, had Mary Pat Berry from the  
18 Alternate Public Defender's Office;

19  
20 Luis Eduardo Martinez, CR13-1937, had Dennis Hough from the Washoe  
21 County Public Defender's Office;

22  
23  
24  
25 <sup>1</sup> Jennifer Lunt had been alleged to be ineffective in Wilson's case of *Gilbert White*  
*v. Warden*, CR07P1540.

1 Anthony Eugene Thomas, CR09-0207, had Rich Davies and Jim Leslie of  
2 the Washoe County Public Defender's Office;

3 Craig Allen Hoffman, CR11-1278, had Jay Slocum of the Washoe County  
4 Public Defender's Office.  
5

6 (2) have no legal, financial or familial relationship to any attorney whose  
7 qualification or performance will be evaluated;

8 (3) are not directly related to the judiciary or any prosecution function;  
9

10 In this regard, at the only meeting between Wilson and the Model Court  
11 Selection Committee on November 9, 2015, the members advised Wilson, "We  
12 received this complaint from Chief Deputy District Attorney Terrence P. McCarthy  
13 regarding these two Nevada Supreme Court decisions." One member stated, "You  
14 must have really 'pissed off' somebody over in the District Attorney's Office." At  
15 least three (3) of the five members acknowledged this expression stating, "You  
16 better cross all your T's and dot all your I's." Ex. 6.  
17

18 The interference by the Washoe County District Attorney's Office, through  
19 Chief Appellate Deputy District Attorney Terrence P. McCarthy, regarding the  
20 three (3) cases where he was involved and acted as opposing counsel against  
21 Wilson created a clear conflict of interest for the Model Court Selection  
22 Committee and violated the provision where the Committee members should be  
23 free from any prosecutorial function.  
24  
25

1 As stated, in all three cases brought by Chief Appellate Deputy District  
2 Attorney Terrence P. McCarthy, Coleman, Hoffman, and Mattoon, the State lost,  
3 making it appear that Mr. McCarthy acted begrudgingly against Wilson. Exs. 7, 8,  
4 14, and 18.

5  
6 In the Mattoon case, Chief Appellate Deputy District Attorney Terrence P.  
7 McCarthy verbally opposed Ms. Mattoon's withdrawal of her petition, despite  
8 Mattoon receiving emotional benefit from her decision, since she could keep her  
9 position in the Dog Program and employment with Prison Services while serving  
10 her last two (2) years in Florence McClure Correctional Center, Las Vegas,  
11 Nevada. Ex. 6 (affidavit regarding the telephone conference with Sattler) and 13.

12  
13 As such, the Model Court Selection Committee was unduly influenced by  
14 Wilson's opposing counsel, Chief Appellate Deputy District Attorney, Terrence P.  
15 McCarthy, in the target cases of Coleman, Hoffman, and Mattoon.

16  
17 This added pressure placed upon the Alternate Public Defender, Jennifer Lunt,  
18 and Washoe County Public Defender, Jeremy Bosler, should render the decision to  
19 remove Wilson from the Appointed Counsel list null and void.  
20

21 (4) have an interest in the variety of types of cases that are represented by the  
22 appointed counsel lists to be selected by the Committee.  
23  
24 Ex. 5, V. A. 1. a. (1-4).  
25

1 IV. The Model Court Selection Committee's directive to take away all open  
2 and pending cases violates ten (10) indigent client's Sixth Amendment  
3 rights to meaningful effective assistance of counsel  
4

5 Open and Pending Cases

6 The following cases are open and pending, which have been worked  
7 upon by Wilson, her assistants, investigators, and expert witnesses since  
8 the time of appointment, which in most every case amount to years.  
9

10 These indigent clients have not complained about Wilson and are  
11 awaiting resolution of their cases. Although they do not have the right to  
12 particular counsel, to reassign new post conviction counsel at this time  
13 would violate the intent of ADKT No. 411 and violate their Sixth  
14 Amendment rights to enjoy a meaningful relationship with counsel, which  
15 have taken years to develop, proven by the date of initial appointment.  
16

17 Codie Michael Scott Walker, CR12-0319A, Department 3,  
18 Murder, appointed July 1, 2015, Evidentiary Hearing, March 29,  
19 2017  
20

21 Robert Adam McGuffey, CR12-0465, Department 6, Burglary,  
22 appointed January 22, 2015, Evidentiary Hearing, September 22,  
23 2016  
24  
25

1 Miguel Omar Ojeda-Enriquez, CR11-0482, Department 7,  
2 appointed July 16, 2014, Sexual Assault of Child Under the Age  
3 of Fourteen Years, Re-Opening of Evidentiary Hearing, March  
4 3, 2017, Motion to Stay in this Court, 69963

5  
6 Ignacio Valencia, CR10-2173, Department 7, appointed January  
7 29, 2014, Sexual Assault of a Child Under the Age of Fourteen  
8 Years, Evidentiary Hearing, February 10, 2017

9  
10 Aurora Rodriguez-Perez, CR11P1020B, Department 7,  
11 appointed April 1, 2013, Murder, Appeal due October 26, 2016,  
12 70745

13  
14 Mohamed Kamaladeen, CR08-0196, Department 7, appointed  
15 December 15, 2010, Murder, Awaiting decision on Appeal,  
16 69247

17  
18 D’Vaughn King, CR12-1160, Department 7, appointed March  
19 24, 2016, Murder

20 David Sanchez-Dominguez, CR10-0866, Department 8,  
21 appointed September 5, 2014, Murder, Awaiting decision on  
22 Appeal, 70622

23  
24 Jose Francisco, CR12-2051, Department 8, appointed December  
25 8, 2014, Trafficking, Evidentiary Hearing, January 19, 2017

1        Luis Eduardo Martinez, CR13-1937, Department 9, appointed  
2        May 21, 2015, Discharging a Firearm into a Car and Residence  
3        in Furtherance of Gang Activity, Awaiting decision on Appeal,  
4        69641  
5

6        Donald Jackson, CR12-1617, Department 9, appointed  
7        September 22, 2015, Murder of Child  
8

9        Anthony Eugene Thomas, CR09-0207, Department 10,  
10       appointed December 20, 2013, Sexual Assault of a Child Under  
11       the Age of Fourteen Years, Evidentiary Hearing, September 15,  
12       2016  
13

14       Airell Sawyer, CR06P1022, Department 10, appointed July 11,  
15       2008, Murder, Awaiting decision on Petition for Re-Hearing,  
16       67829  
17

18       Robert Schnueringer, CR12-0326A, Department 10, appointed  
19       February 27, 2015, Murder, Evidentiary Hearing, January 4,  
20       2017  
21

22       Most disturbing, two (2) of the open and pending cases are set for evidentiary  
23       hearings, which demand professional preparation on September 15<sup>th</sup> and 22<sup>nd</sup> in the  
24       Second Judicial District Court, Departments 10 and 6, Anthony Thomas and  
25       Robert McGuffey.

1 The letter of August 18, 2016 demanded that Wilson stop working immediately  
2 and no compensation for cases would be provided from that date forth. Ex. 1. As  
3 such, these two (2) indigent clients would particularly suffer.  
4

5 In conclusion, Wilson, requests this Court prohibit the Model Court Selection  
6 Committee from enforcing its decision to preclude Wilson from receiving any new  
7 cases from the Court Administrator and take away all open and pending cases;  
8 remove the Alternate Public Defender and Washoe County Public Defender from  
9 the Committee; preclude members of the Washoe County District Attorney's  
10 Office from interfering with the Committee's decision-making; and mandate the  
11 Committee to reinstate Wilson to retain the ten (10) open and pending cases. Ex. 4,  
12 ADKT 411 Ex. 5, A, pp. 18-22.  
13  
14

15 DATED this 26<sup>th</sup> day of August, 2016.

16 By: s/s: MARY LOU WILSON  
17 MARY LOU WILSON  
18 Attorney At Law Bar #3329  
19 333 Marsh Ave.  
20 Reno, Nevada 89509  
21 775-337-0200  
22  
23  
24  
25

**CERTIFICATE OF SERVICE**

I, Mary Lou Wilson, hereby affirm that on the 26<sup>th</sup> day of August, 2016, I e-filed the aforementioned document through the Master List of e-filers and sent a hard copy through the U.S. Mail to the following:

Tracie Lindeman (e-filed)  
Clerk of the Nevada Supreme Court  
201 South Carson Street  
Carson City, Nevada 89701

Jennifer Lunt (hard copy hand-delivered)  
(A representative of the Model Court Selection Committee)  
Alternate Public Defender  
350 South Center Street, 6<sup>th</sup> Floor  
Post Office Box 11130  
Reno, Nevada 89520-0027

CODIE MICHAEL SCOTT WALKER (U.S. Mail)  
Inmate Number 1095466  
Lovelock Correctional Center  
1200 Prison Road  
Lovelock, Nevada 89419

ROBERT ADAM MCGUFFEY (U.S. Mail)  
Inmate Number 1040469  
Lovelock Correctional Center  
1200 Prison Road  
Lovelock, Nevada 89419

MIGUEL OMAR OJEDA-ENRIQUEZ (U.S. Mail)  
Inmate Number 1097532  
Lovelock Correctional Center  
1200 Prison Road  
Lovelock, Nevada 89419

1 **IGNACIO VALENCIA (U.S. Mail)**

2 **Inmate Number 1085914**

3 **Lovelock Correctional Center**

4 **1200 Prison Road**

5 **Lovelock, Nevada 89419**

6 **AURORA RODRIGUEZ-PEREZ (U.S. Mail)**

7 **Inmate Number 1090026**

8 **Florence McClure Correctional Center**

9 **4370 Smiley Road**

10 **Las Vegas, Nevada 89115**

11 **MOHAMED KAMALAUDEEN (U.S. Mail)**

12 **Inmate Number 1028281**

13 **Northern Nevada Correctional Center**

14 **P.O. Box 7000**

15 **Carson City, Nevada 89702**

16 **D'VAUGHN KING (U.S. Mail)**

17 **Inmate Number 1115593**

18 **Northern Nevada Correctional Center**

19 **P.O. Box 7000**

20 **Carson City, Nevada 89702**

21 **DAVID SANCHEZ-DOMINGUEZ (U.S. Mail)**

22 **Inmate Number 1097532**

23 **Northern Nevada Correctional Center**

24 **P.O. Box 7000**

25 **Carson City, Nevada 89702**

**JOSE FRANCISCO (U.S. Mail)**

**Inmate Number 1108909**

**Southern Desert Correctional Center**

**P.O. Box 208**

**Indian Springs, Nevada 89070-0208**

1 LUIS EDUARDO MARTINEZ (U.S. Mail)

2 Inmate Number 1118719

3 High Desert State Prison

4 P.O. Box 650

Indian Springs, Nevada 89070

5 DONALD JACKSON (U.S. Mail)

6 Inmate Number 1113011

7 Ely State Prison

8 P.O. Box 1989

Ely, Nevada 89301

9 ANTHONY EUGENE THOMAS (U.S. Mail)

10 Inmate Number 91694

11 Lovelock Correctional Center

12 1200 Prison Road

Lovelock, Nevada 89419

13 AIRELL SAWYER (U.S. Mail)

14 Inmate Number 92925

15 Lovelock Correctional Center

16 1200 Prison Road

Lovelock, Nevada 89419

17 ROBERT SCHNUERINGER (U.S. Mail)

18 Inmate Number 1097645

19 Southern Desert Correctional Center

20 P.O. Box 208

21 Indian Springs, Nevada 89070-0208

**Exhibits in Support of Petition for Writ of Mandamus**

**Exhibit 1, Letter from Jennifer Lunt, dated August 18, 2016**

**Exhibit 2, Email to Robert Bell's Office Regarding Hearing Dates**

**Exhibit 3, Letter to Robert Bell's Office Regarding Open Cases**

**Exhibit 4, Nevada Supreme Court, ADKT 411, 2008**

**Exhibit 5, Washoe County District Court Order Regarding ADKT 411**

**Exhibit 6, Affidavit of Mary Lou Wilson**

**Exhibit 7, Nevada Supreme Court Order of Reversal and Remand on Coleman**

**Exhibit 8, Nevada Supreme Court Order Granting Writ of Mandamus on Hoffman**

**Exhibit 9, Petition for Writ of Mandamus on Hoffman**

**Exhibit 10, Letter from Jeremy Bosler**

**Exhibit 11, Email from Mary Lou Wilson to Jeremy Bosler, June 28, 2016**

**Exhibit 12, Email from Mary Lou Wilson to Jeremy Bosler, July 2, 2016**

**Exhibit 13, Transcript of Hearing, Mary Anne Mattoon**

**Exhibit 14, Letter to Jeremy Bosler from Mary Lou Wilson, July 2, 2016**

**Exhibit 15, Email from Jennifer Lunt, November 4, 2015**

1 Exhibit 16, Coleman Case Documents

2  
3 Exhibit 17, Hoffman Case Documents

4 Exhibit 18, Exhibits to Jeremy Bosler in Support of the Letter

5  
6 Exhibit 19, Letter from Client Craig Hoffman

7 Exhibit 20, Affidavit of Michael E. Wilson

8  
9 Exhibit 21, Self-Reporting Memorandum

~~EXHIBIT 2~~  
Affidavit of MARY Lou Wilson.

PGS - 1 of 1

EXHIBIT 2

1 AFFIDAVIT OF MARY LOU WILSON

2 STATE OF NEVADA           )  
  ): ss  
3 COUNTY OF WASHOE       )

4 I, MARY LOU WILSON, hereby swear under penalty of perjury that the following is a true  
5 statement:

6 That I am the lawyer in good standing with the Nevada State Bar, admitted to practice law since  
1987, and am one of the Petitioners in the above-entitled action;

7 That I represent the listed Petitioners in the above-entitled action; some of which are open and  
8 pending cases in the Second Judicial District Court and others are open and pending cases in the  
9 Nevada Supreme Court;

10 That I authored the aforementioned action;

11 Regarding the Law Office of Mary Lou Wilson, Inc. going out of business

12 On pages thirteen (13) and fifteen (15), of the Petition for Writ of Mandamus or Prohibition,  
13 shown as Exhibit 6, it alleged that the impact of the Model Court Selection Committee's letter  
would result in the my office going out of business;

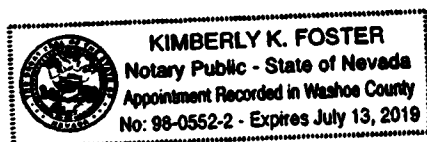
14 I have restricted my practice to only court appointed cases; most of these cases are from the  
15 Court Administrator, Robert C. Bell, which are practiced in the Second Judicial District Court;  
16 and upon compliance with the Model Court Selection Committee's letter would result in closing  
the Law Office of Mary Lou Wilson, Inc.

17 DATED this 29 day of August, 2016.

18 Mary Lou Wilson  
19 MARY LOU WILSON

20 Subscribed and sworn to before me this 29<sup>th</sup> day of August, 2016, by  
xx Mary Lou McSweeney-Wilson. xx

21 Kimberly K. Foster  
22 NOTARY PUBLIC



**CERTIFICATE OF SERVICE BY MAILING**

I, Robert, Adam McGuffey, hereby certify, pursuant to NRCP 5(b), that on this 8th day of September, 2016, I mailed a true and correct copy of the foregoing, "Motion For ORDER to STOP ATTACK ON MARY LOU WILSON" by placing document in a sealed pre-postage paid envelope and deposited said envelope in the United State Mail addressed to the following:

Attorney General  
ADAM LAVAST  
555 E Washington Ave  
Suite 3900  
LAS VEGAS, NV 89101

CLERK OF THE U.S. Dist  
Court Dist of NEVADA Suite  
301 400 S. Virginia St  
Reno, NV, 89501

MARY LOU WILSON ESQ  
333 MARSH AVE  
Reno, NV, 89509

CC:FILE

DATED: this 8th day of September, 2016.

Robert McGuffey  
Robert McGuffey # 1040469  
In Propria Personam  
Post Office Box 208, S.D.C.C. L.L.C.  
Indian Springs, Nevada 89018 1200 PRISON RD  
IN FORMA PAUPERIS: Las Vegas, NV 89419

AFFIRMATION  
Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding Motion for  
Order to Stop the Attack on Mary Lou Wilson  
(Title of Document)

U.S.  
filed in District Court Case number 3:16-cv-00356

☒ Does not contain the social security number of any person.

-OR-

☐ Contains the social security number of a person as required by:

A. A specific state or federal law, to wit:

\_\_\_\_\_  
(State specific law)

-or-

B. For the administration of a public program or for an application  
for a federal or state grant.

Robert McGuffey  
Signature

9-8-2016  
Date

Robert McGuffey - 10404169  
Print Name

PRG - SC  
Title